Northern District of California

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT
JORTHERN DISTRICT OF CALIFORNIA

TESLA, INC., Plaintiff, v. PROCEPTION, INC., et al.,

Defendants.

Case No. 25-cv-04963-SVK

ORDER GRANTING IN PART THE RTIES' MOTIONS TO SEAL RE PRELIMINARY INJUNCTION **BRIEFING AND SUBMISSIONS**

Re: Dkt. No. 17, 44, 65, 70, 71, 90, 91

Before the Court are various administrative motions to seal filed by the Parties in connection with Plaintiff's Motion for Preliminary Injunction (Dkt. 14) and subsequent briefing.¹ Dkts. 17, 44, 65, 70, 71, 90, 91. Pursuant to Civil L.R. 79-5(f), where required, Tesla has filed statements in support of the requested sealing. See Dkts. 81, 94. The sealing motions have been unopposed, except for Defendants' partial opposition of Tesla's sealing request at Dkt 81. See Dkt. 83. Thereafter, Tesla filed an amended statement in support of sealing, (see Dkt. 86), proposing narrowed redactions which Defendants have not opposed. Having considered the Parties' submissions, the relevant law and the record in this action, the motions are **GRANTED IN PART**.

Courts recognize a "general right to inspect and copy public records and documents, including judicial records and documents." Kamakana v. City & Cnty. Of Honolulu, 447 F.3d 1172, 1178 (9th Cir. 2006) (quoting Nixon v. Warner Commc'ns., Inc., 435 U.S. 589, 597 & n.7 (1978)). The standard for overcoming the presumption of public access to court records depends on the purpose for which the records are filed with the court. A party seeking to seal court records relating to motions that are "more than tangentially related to the underlying cause of action" must demonstrate "compelling reasons" that support secrecy. Ctr. For Auto Safety v. Chrysler Grp.,

¹ Pursuant to the Court's instruction at the hearing, the Parties may seek to redact portions of the currently-sealed Hearing Transcript (Dkt. 108) no later than November 22, 2025.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

809 F.3d 1092, 1099 (9th Cir. 2016). For records attached to motions that are "not related, or only tangentially related, to the merits of the case," such as "a discovery motion unrelated to the merits of the case," the lower "good cause" standard applies. *Id.*; see also Kamakana, 447 F.3d at 1179. The requests at issue relate information submitted in support of Tesla's Motion for Preliminary Injunction, which relates to the merits of Tesla's misappropriation claims. Accordingly, the "compelling reasons" standard applies.

The Court appreciates the Parties' care in proposing narrow redactions, and Tesla's willingness to further narrow redactions upon objection by Defendants. Upon the Court's review, the primary material that the Parties continue to request remain under seal are specifics such as file names, file paths, employee names (of employees who have not submitted declarations in this case), team structure information and third-party vendor details. See, generally, Table below. Such material is of limited public value and its disclosure would cause harm both to Tesla, in the form of posing security vulnerabilities for Tesla's Optimus network, and specific employees of the Parties, in the form of disclosing personally identifiable information. Moreover, the Court does not refer to such sealed information in its accompanying Order, such that it is of limited public value. Accordingly, the Court finds compelling reasons to maintain such information under seal.

Additionally, in select cases Tesla has sought to seal sensitive project details related to its Optimus technology. For the most part, the Court agrees that the disclosure of such non-public and specific information would endanger Tesla's Optimus-related trade secrets and inflict competitive harm on Tesla. Moreover, the Court does not refer to any such highly sensitive information in its accompanying Order. Accordingly, the Court finds compelling reasons to maintain such information under seal, except as noted below.

In summary, the Court **GRANTS IN PART** the Parties' motions to seal as follows:

Document	Portions to Be Sealed	Court Ruling
First Declaration of	Highlighted portions at ECF pages:	For the reasons
Prem Pinto in Support	3:12-13 (filename)	explained above,
of Preliminary	3:20 (filename)	GRANTED.
Injunction	3:26-27 (filename)	
	4:5 (filename)	
[Dkt. 17-4]	4:13 (filenamé)	
	4:28-5:1 (filenames)	
	5:21 (filenames)	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Document	Portions to Be Sealed	Court Ruling
2 ooumono	6:3–4 (filenames)	- Court Ituming
The Access Log (both the corrected and original versions), <i>i.e.</i> Tabs A-K of Exhibit A to the Declaration of Jeff Liang in Support of Preliminary Injunction [Dkt. 14-34 (original)] [Dkt. 44-4 (corrected)]	All file paths contained in the ObjectId and SiteUrl columns; Select file names highlighted in the SourceFileName column.	Dkt. 14-34 shall be maintained under seal, as it is superseded by Dkt. 44-4 and was not considered by the Court. Sealing of Dkt. 44-4 is GRANTED for the reasons explained above.
Tesla's Supplemental Brief in Support of Preliminary Injunction [Dkt 65-4]	Highlighted portions at ECF pages: 4:17 (filename excerpt) 5:9 (vendor name and filename)	For the reasons explained above, GRANTED.
Exhibit A to Declaration of David Lee in Support of Supplemental Brief in Support of Preliminary Injunction	Highlighted portions at ECF pages: 2 (filenames within file paths) 3 (filenames within file paths)	For the reasons explained above, GRANTED.
[Dkt. 65-14] Exhibit B to Declaration of Angelique Kaounis in Support of Supplemental Brief in Support of Preliminary Injunction [Dkt. 65-5]	Highlighted portions at transcript pages: 48:9, 11, 14, 16 (employee names) 51:20-24 (team structure information) 54:13, 25 (reference to team name) 74:14, 19 (employee names) 134:5-6 (Optimus project detail) 217:1, 22 (Optimus project detail) 217:25 (vendor name) 222:25 (filename excerpt) 226:14 (Optimus project detail name and codename) 226:25 (Optimus project detail) 230:17 (Optimus project detail name) 240:9-10, 23 (Optimus project detail) 250:5, 16 (employee name)	GRANTED IN PART for the reasons explained above, except for 54:13, 54:25, which is GRANTED as unopposed and due to its limited public value and impact on the Court's accompanying Order. DENIED as to 204:24-205:5, 217:8 and 252:16-18 as being information of a sufficiently high level such that competitive or other harm is unlikely to result. However, Tesla need not re-file the transcript at this time.
Supplemental Declaration of Prem Pinto in Support of Preliminary Injunction	Highlighted portions at ECF pages: 2:24 (file description and codename) 3:7 (vendor name and filename) 4:1 (filename description) 4:2-6 (Optimus project detail)	GRANTED IN PART for the reasons explained above. DENIED as to 3:10-

Document	Portions to Be Sealed	Court Ruling
[Dkt. 65-6]		12 as being
		information of a
		sufficiently high level
		such that competitive
		or other harm is
		unlikely to result, and
		as being highly
		relevant to the Court's
		opinion and thus of
		potential interest to the
	T (' 1)	public.
Exhibits A-G to the	Entire documents	GRANTED as entire
Supplemental Declaration of Prem		documents allegedly
Pinto in Support of		containing Optimus- hands trade secrets and
Preliminary Injunction		whose disclosure,
1 Tellimiary injunction		other than at a very
[Dkts. 65-7–65-13]		high level, would
[286.00 , 00 10]		endanger the trade
		secrets therein and
		inflict competitive
		harm to Tesla.
Declaration of Zhongjie	Highlighted portions at paragraphs:	For the reasons
"Jay" Li in Opposition	46af (Proception employee names	explained above,
to Tesla's Motion for	and links to their LinkedIn pages)	Defendants motion to
Preliminary Injunction		seal is GRANTED .
[FD1 = 0.0]	Additional portions at ECF pages:	
[Dkt. 70-3]	3:4-5 (Tesla employee name)	Tesla's motion to seal
	3:5-6 (Tesla employee name)	is GRANTED IN
	3:6 (Tesla employee name)	PART AND DENIED
	3:7-8 (team structure information)	IN PART. Certain
	3:9-12 (team structure information)	recitations of team
	3:10 (Tesla employee name) 3:15 (Tesla employee name)	structure and Optimus project information are
	3:20 (Tesla employee name)	at a sufficiently high
	3:21-22 (team structure information)	level such that
	3:22-24 (employee & intern names)	competitive or other
	3:24 (Tesla employee names)	harm is unlikely to
	3:27 (team structure information)	result and, moreover,
	4:1 (team structure information)	is highly relevant to
	4:2 (sensitive Optimus project detail)	the Court's opinion
	4:4 (sensitive Tesla project details)	and thus of potential
	4:11 (Tesla employee name)	interest to the public.
	4:12 (Tesla employee name)	
	4:13 (team structure information)	
	4:16 (Tesla employee names)	
	4:19 (Tesla employee name)	
	4:22 (Tesla employee names)	
	4:22-23 (team structure information) 4:23 (Tesla employee name)	
	4:26 (Tesla employee name)	
	5:1 (Tesla employee names)	
	5:9 (Tesla employee name)	
	5:11 (Tesla employee names)	
	5:12 (Tesla employee name)	

Document	Portions to Be Sealed	Court Ruling
	5:18 (Tesla employee name)	
	5:19-21 (team structure information)	
	6:1-2 (team structure information)	
	6:5 (sensitive Optimus project details)	
	6:9-10 (Tesla employee names)	
	6:13 (Tesla employee names)	
	6:15 (Tesla employee names)	
	8:20 (Tesla employee name)	
	8:21 (Tesla employee & vendor name)	
	8:22 (vendor details) 8:23 (vendor details)	
	8:23 (Vendor details) 8:23 (Tesla employee name)	
	8:27 (Tesla employee name)	
	8:28 (Tesla intern name)	
	9:1 (Tesla intern name)	
	9:2 (Tesla intern name)	
	9:7-8 (confidential file title)	
	9:15 (Tesla employee name)	
	9:18 (Tesla intern name)	
	9:23 (vendor details)	
	10:19 (vendor details)	
	10:20 (vendor details)	
	12:17 (vendor details)	
	12:18 (vendor details)	
Defendant's Opposition	Portions at PDF pages:	For the reasons
to Tesla's Motion for	277 (1 1 2 2)	explained above,
Preliminary Injunction	ii:7 (vendor details)	GRANTED.
[D] 71 21	ii:18 (vendor details)	
[Dkt. 71-2]	3:19 (name of Tesla employee)	
	3:24-26 (names of Tesla employees) 3:26 (names of Tesla employees)	
	6:12 (vendor details)	
	6:16 (title of sensitive Optimus document)	
	6:16 (vendor details)	
	6:17 (vendor details)	
	6:19 (vendor details)	
	6:20 (vendor details)	
	6:20 (name of Tesla employee)	
	6:21 (vendor details)	
	7:4 (name of Tesla employee)	
	7:10 (vendor details)	
	7:11 (vendor details)	
	7:14 (vendor details)	
	9:4 (title of sensitive Optimus document)	
	10:15 (vendor details)	
	11:25 (Tesla intern name)	
	16:5 (vendor details) 18:16 (vendor details)	
	19:13 (Tesla intern name)	
	20:25 (vendor details)	
	21:2-3 (vendor details)	
	21:6 (vendor details)	
	21:8 (vendor details)	
	21:10 (vendor details)	
	21:12 (vendor details)	
	/	

D '	D4' 4 D C 1 1	C (D 1'
Document	Portions to Be Sealed	Court Ruling
	21:15 (vendor details)	
	21:20 (vendor details) 21:24 (vendor details)	
	22:15 (vendor details)	
	22:16 (vendor details)	
	22:27 (vendor details)	
	23:11 (name of Tesla employee)	
	23:11 (vendor details)	
	23:17 (vendor details)	
	23:16 (vendor details)	
	24:3 (vendor details)	
	25:15 (vendor details)	
	25:18 (vendor details)	
	26:1 (vendor details)	
	27:22 (vendor details)	
	29:14 (vendor details)	
	29:16 (vendor details)	
	33:22 (vendor details)	
Declaration of Jaideep	Portions at PDF pages:	For the reasons
Venkatesan in Opposition to Tesla's	3:14 (confidential Tesla file name)	explained above, GRANTED.
Motion for Preliminary	3:15-17 (sensitive Tesla vendor	GRANTED.
Injunction	details)	
injunction	3:19-20 (sensitive Tesla vendor	
[71-4]	details)	
Exhibit B to Venkatesan	Entire document	The Court did not
Declaration		consider or cite these
		transcript pages in its
[Dkt. 71-5]		accompanying Order,
		and thus may maintain
		this discovery
		document under seal as
		having little, if any, public value at this
		time.
Exhibit C to Venkatesan	Redactions as proposed by Tesla in its	GRANTED for the
Declaration	amended statement, see Dkt. 85-1.	reasons explained
	antinada santinani, see Ditti 05 1.	above, including
[Dkt. 71-6]		because the narrowed
- 1		redactions are
		unopposed by
		Defendants and
		because the details
		sought to be redacted
		are at a much more
		granular level than the
		corresponding high-
		level statements in,
Exhibit D to	Entire document	<i>e.g.</i> , the Opposition. GRANTED as entire
Venkatesan Declaration	Entire document	document allegedly
v clikatesali Declaration		containing Optimus-
[Dkt. 71-7]		hands trade secrets and
		whose disclosure,
		miose disclosure,

Do over on 4	Doutions to Do Cooled	Count Duling
Document	Portions to Be Sealed	Court Ruling other than at a very
		high level, would endanger the trade secrets therein and inflict competitive harm to Tesla.
Exhibit E to Venkatesan Declaration [Dkt. 71-8]	Entire document (LinkedIn Profile)	For the reasons explained above, GRANTED.
Exhibit F to Venkatesan Declaration [Dkt. 71-9]	Redactions as proposed by Tesla in its amended statement, see Dkt. 85-2, except not the following: "actuator w foot," "Gen w [h]and," "foot w sensor," "gen 4," "gen" "gen 1" "gen4" "4 [h]ands Gen4"	GRANTED IN PART for the reasons explained above, including because the narrowed redactions are unopposed by Defendants and because the details sought to be redacted are at a more granular level than the corresponding high- level statements in, e.g., the Opposition.
		However, sealing of a few of the terms herein are DENIED as follows, because they are either of a sufficiently high level, have been made otherwise public, or else are highly relevant to the Court's accompanying order and thus of significant public interest.
Exhibit G to Venkatesan Declaration [Dkt. 71-10]	Redactions as proposed by Tesla in its amended statement, <i>see</i> Dkt. 85-3.	For the reasons explained above, GRANTED.
Exhibits K to Venkatesan Declaration [Dkt. 71-11]	Entire document	GRANTED as entire document allegedly containing Optimushands trade secrets and whose disclosure, other than at a very high level, would endanger the trade secrets therein and inflict competitive harm to Tesla.
Exhibits L to Venkatesan Declaration	Entire document	GRANTED as entire document allegedly

D	Doubi 4- D. C. 1 1	Co4 D1*
Document	Portions to Be Sealed	Court Ruling
[Dkt. 71-12]		containing Optimus- hands trade secrets and
[DKt. /1-12]		whose disclosure,
		other than at a very
		high level, would
		endanger the trade
		secrets therein and
		inflict competitive
		harm to Tesla.
Exhibit M to	Entire document (LinkedIn Profile)	For the reasons
Venkatesan Declaration		explained above,
[Dkt 71 13]		GRANTED.
[Dkt. 71-13] Exhibits N to	Entire document	GRANTED as entire
Venkatesan Declaration	Entire document	document allegedly
, cintagesum B cerumusem		containing Optimus-
[Dkt. 71-14]		hands trade secrets and
-		whose disclosure,
		other than at a very
		high level, would
		endanger the trade
		secrets therein and
		inflict competitive harm to Tesla.
Exhibit O to	Entire document	The Court did not
Venkatesan Declaration	Entire document	consider or cite these
V CHRAICSAN D'CHAILAIGH		transcript pages in its
[Dkt. 71-15]		accompanying Order,
		and thus may maintain
		this discovery
		document under seal
		as having little, if any,
		public value at this
Exhibit P to the		DENIED. This
Venkatesan Declaration		document is a
, chatesan Declaration		published research
[Dkt. 71-16]		article and,
		accordingly, is not
		confidential and may
		not be maintained
		under seal. Moreover,
		in its supporting
		statement, Tesla does
		not seek to maintain this document under
		seal.
Exhibit Q to the		DENIED. This
Venkatesan Declaration		document is a
		published research
[Dkt. 71-17]		article and,
		accordingly, is not
		confidential and may
		not be maintained
		under seal. Tesla does

Declaration of Lucas Woodland in Opposition to Tesla's Motion for Preliminary Injunction [Dkt. 71-18] Exhibit A to the Woodland Declaration Exhibit A to the Woodland Declaration Exhibit A to the Woodland Declaration [Dkt. 71-19] Exhibit A to the Woodland Declaration [Dkt. 79-5] Exhibit A to the Woodland Declaration [Dkt. 90-5] Declaration of Terly Alaname Ala	D t	D 4' 4 D C 1 1	C A D II
Declaration of Lucas Woodland in Declaration of Freliminary Injunction Exhibit A to the Woodland Declaration Dett. 71-19 Tesla's Reply Brief in Support of Preliminary Injunction [Dkt. 90-5] Declaration of Tery American Support of Preliminary Injunction Declaration of Tery American Support of Preliminary Injunction Dict. 90-5] Declaration of Tery American Support of Preliminary Injunction Declaration of Tery American Support of Support of Preliminary Injunction Declaration of Tery American Support of Preliminary Injunction Declaration of Tery American Support of S	Document	Portions to Be Sealed	Court Ruling
Seal Portions at ECF pages: Seal For the reasons explained above, GRANTED.			
Declaration of Lucas Woodland in Opposition to Tesla's 4:21-22 (filename) 4:22 (vendor name) 4:23 (vendor name) 5:16 (Tesla employce name) 5:16, 5:7-8 (filename and employce name visible in image) 5:15 (vendor name) 6:16-17, 20-21 (filename and employce name visible in image) 7:17-23 (filenames and filename and employee name visible in image) 7:17-23 (filenames and filename) 6:16-17, 20-21 (filename) 7:17-23 (filenames and filename) 7:17-23 (filenames and filename) 7:17-23 (filename) 7:17-23 (filenames) 7:17-23 (filename) 7:17-23 (filename) 7:19			
Acceptance Acc	Declaration of Lucas	Portions at ECF pages:	
Motion for Preliminary Injunction Dkt. 71-18	Woodland in	1 5	explained above,
Injunction 3.23 (vendor name) 5:1 ((Tesla employee name) 5:6, 5:7-8 (filename and employee name) 5:6, 5:7-8 (filename and employee name) 5:16.17 (file path and filename) 5:16.17 (file path and filename) 6:4 (vendor name) 6:4 (vendor name) 6:6 (vendor name) 6:6 (vendor name) 6:6 (vendor name) 6:6 (vendor name) 7:17-23 (filename) 7:14 (filena			GŘANTED.
St. ((Tesla employee name)			
[Dkt. 71-18] 5:6, 5:7-8 (filename and employee name visible in image) 5:16-17 (file path and filename) 5:16-17 (file path and filename) 6:4 (vendor name) 6:6 (vendor name) 7:14 (filename) 7:17-23 (filenames and file paths) Redactions as proposed by Tesla in its amended statement, see Dkt. 85-3. For the reasons explained above, GRANTED.	Injunction		
name visible in image) 5:15 (vendor name) 5:16-17 (file path and filename) 5:24 (vendor name) 6:4 (vendor name) 6:6 (vendor name) 7:17-23 (filename visible in image) 7:14 (filename) 7:17-23 (filenames and file paths) Redactions as proposed by Tesla in its amended statement, see Dkt. 85-3. Brot the reasons explained above, GRANTED. For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. 10:6 (filename) 10:19 (filename) 11:3 (filename) 11:3 (filename) 11:3 (filename) 11:20 (filenames) 11:3 (filename) 13:5 (filename) 13:5 (filename) 13:5 (filename) 13:11, 12, 13 (vendor name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-6] Exhibit A to Ahearn Declaration of Terry Ahearn in Support of Preliminary Injunction Highlighted portions at ECF page 2 For the reasons explained above, GRANTED.	[Dlat 71 18]		
S:15 (vendor name) S:16-17 (file path and filename) S:24 (vendor name) G:4 (vendor name) G:6 (vendor name) G:6 (vendor name) G:6 (vendor name) G:16-17, 20-21 (filename and employee and veisible in image) T:17-23 (filenames and file paths)	[DKt. /1-10]		
S:16-17 (file path and filename) S:24 (vendor name) 6:4 (vendor name) 6:6 (vendor name) 7:17-23 (filename and employee name visible in image) 7:14 (filename and employee name) 7:17-23 (filename and file paths) For the reasons explained above, GRANTED. Exhibit A to the Woodland Declaration Dick of filename, 10:6 (filename) 10:24 (filename) 10:24 (filename) 10:24 (filename) 11:3 (filename) 11:4 (filename) 11:4 (filename) 11:4 (vendor name) 11:4 (vendor nam			
G:4 (vendor name) G:6 (vendor name) C:17-20-21 (filename and employee name visible in image) T:17-23 (filenames and file paths)		5:16-17 (file path and filename)	
6:6 (vendor name) 6:16-17, 20-21 (filename and employee name visible in image) 7:14 (filename) 7:14 (filename) 7:14-23 (filenames and file paths)			
Comparison of Terry Ahearn in Support of Preliminary Injunction Declaration of Terry Ahearn in Support of Preliminary Injunction Declaration of Declaration of Declaration of Preliminary Injunction Declaration of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Support of Preliminary Injunction Declaration of Prem Pinto in Su			
Exhibit A to the Woodland Declaration Redactions as proposed by Tesla in its amended statement, see Dkt. 85-3. For the reasons explained above, GRANTED.			
Exhibit A to the Woodland Declaration [Dkt. 71-19] Tesla's Reply Brief in Support of Preliminary Injunction [Dkt. 90-5] Declaration of Terry Ahearn in Support of Preliminary Injunction Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to the Woodland Declaration Redactions as proposed by Tesla in its amended statement, see Dkt. 85-3. Highlighted portions at ECF pages: 10:6 (filename) 10:19 (filename) 10:19 (filename) 11:3 (filename) 11:3 (filename) 11:3 (filename) 11:16 (filename) 11:20 (filenames) 11:3 (filename) 13:5 (filename) 13:11, 12, 13 (vendor name) 13:11, 12, 13 (vendor name) Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration of Prem Pinto in Support of Prem Pinto in Support of Preliminary Injunction Highlighted portions at ECF pages: Highlighted portions at ECF pages: For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. For the reasons explained above, GRANTED.			
Exhibit A to the Woodland Declaration [Dkt. 71-19] Tesla's Reply Brief in Support of Preliminary Injunction [Dkt. 90-5] Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-7] Third Declaration of Preliminary Injunction Exhibit A to Ahearn Declaration of Preliminary Injunction Exhibit A to Ahearn Declaration of Preliminary Injunction Exhibit A to Sport of Preliminary Injunction Exhibit A to Exhibit A to Preliminary Injunction Exhibit A to Exhibi			
Woodland Declaration Dkt. 71-19 Tesla's Reply Brief in Support of Preliminary Injunction Highlighted portions at ECF pages:			
Tesla's Reply Brief in Support of Preliminary Injunction Tesla's Reply Brief in Support of Preliminary Injunction Total (filename) 10:6 (filename) 10:19 (filename) 10:24 (filename) 11:3 (filename) 11:3 (filename) 11:4 (filename) 11:5 (filename) 11:5 (filenames) 11;6 (filename) 11:20 (filenames) 12:3 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Highlighted portions at ECF pages: For the reasons explained above, GRANTED.			
Tesla's Reply Brief in Support of Preliminary Injunction	Woodland Declaration	amended statement, see Dkt. 85-3.	
Tesla's Reply Brief in Support of Preliminary Injunction 10:6 (filename) 10:19 (filename) 10:24 (filename) 11:3 (filename) 11:3 (filename) 11:3 (filename) 11:4 (filename) 11:4 (filename) 11:40 (filename) 11:40 (filename) 11:20 (filename)	[D]-4 71 10]		GRANTED.
Support of Preliminary Injunction [Dkt. 90-5] Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration of Preliminary Injunction [Dkt. 90-7] Third Declaration of Preliminary Injunction Support of Preliminary Injunction Third Declaration of Preliminary Injunction Support of Preliminary Injunction Third Declaration of Preliminary Injunction Support of Preliminary Injunction Third Declaration of Preliminary Injunction Injunct		Highlighted portions at ECE pages:	For the reasons
Injunction 10:6 (filename) 10:19 (filename) 10:24 (filename) 11:3 (filename) 11:8 (filename) 11:8 (filename) 11:8 (filename) 11:20 (filenames) 11:20 (filenames) 11:20 (filenames) 12:3 (filename) 13:5 (filename) 13:5 (filename) 13:11, 12, 13 (vendor name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) For the reasons explained above, GRANTED. Ipkt. 90-6		ringingined portions at ECT pages.	
[Dkt. 90-5] 10:19 (filename) 10:24 (filename) 11:3 (filename) 11:8 (filename) 11:16 (filename) 11:20 (filename) 11:20 (filenames) 11:20 (filenames) 11:3: (filename) 13:5 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction 10:19 (filename) 11:20 (filename) 13:12 (filename) 13:20 (filename) 3:12 (filename) 3:14 (filename) 3:14 (filename)		10:6 (filename)	
11:3 (filename) 11:8 (filename) 11:8 (filename) 11:16 (filename) 11:16 (filename) 11:20 (filenames) 11:20 (filenames) 11:20 (filenames) 12:3 (filename) 13:5 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) For the reasons explained above, GRANTED. GRANTED. For the reasons explained above, GRANTED. For the reasons explained		10:19 (filename)	
11:8 (filename) 11:16 (filename) 11:20 (filenames) 11:20 (filenames) 11:40 (filenames) 11:40 (filenames) 11:50 (filenames) 11:6 (filenames) 11:6 (filenames) 11:6 (filenames) 12:3 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) For the reasons explained above, GRANTED. Declaration of Preliminary Injunction Highlighted portions at ECF page 2 For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. For the reason	[Dkt. 90-5]		
11:16 (filename) 11:20 (filenames) 11:20 (filenames) 11:20 (filenames) 11:40 (filenames) 12:3 (filenames) 12:3 (filename) 13:5 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) For the reasons explained above, GRANTED. Declaration of Terry Ahearn in Support of Preliminary Injunction Highlighted portions at ECF page 2 For the reasons explained above, GRANTED. Exhibit A to Ahearn Declaration of Prem Pinto in Support of Preliminary Injunction 2:26 (filename) 3:12 (filename) 3:14 (filename) 3:14 (filename) 3:14 (filename) 3:14 (filename) 3:14 (filename) 3:15 (filename) 3:16 (filename) 3:16 (filename) 3:16 (filename) 3:17 (filename) 3:18 (fi			
11:20 (filenames) 11, fn. 5 (filenames) 12:3 (filenames) 12:3 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name)			
11, fn. 5 (filenames) 12:3 (filenames) 13:5 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) Declaration of Terry Ahearn in Support of Preliminary Injunction 3 (employee name) For the reasons explained above, GRANTED. Exhibit A to Ahearn Declaration Highlighted portions at ECF page 2 For the reasons explained above, GRANTED. Exhibit A to Ahearn Declaration of Prem Pinto in Support of Preliminary Injunction 2:26 (filename) 3:12 (filename) 3:14 (filename) 3:14 (filename) 3:14 (filename) 3:14 (filename) 3:15 (filename) 3:16 (filename) 3:16 (filename) 3:17 (filename) 3:18 (fi			
12:3 (filename) 13:5 (filename) 13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) For the reasons explained above, GRANTED. Declaration of Terry Ahearn in Support of Preliminary Injunction Highlighted portions at ECF page 2 For the reasons explained above, GRANTED.			
13:7-8 (employee name) 13:11, 12, 13 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name) 14:11-12 (vendor name)			
Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Highlighted portions at ECF page 2 For the reasons explained above, GRANTED.			
Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Preliminary Injunction [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction 14:11-12 (vendor name) Highlighted portions at paragraphs: For the reasons explained above, GRANTED. GRANTED.			
Declaration of Terry Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Highlighted portions at ECF page 2 For the reasons explained above, GRANTED.			
Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Injunction A (employee name) A (employee name) Bighlighted portions at ECF page 2 For the reasons explained above, GRANTED.		14.11-12 (vendor name)	
Ahearn in Support of Preliminary Injunction [Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Injunction Altern Declaration (Complete Name) Alternation (Complete Name) (Com	Declaration of Terry	Highlighted portions at paragraphs:	For the reasons
[Dkt. 90-6] Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction [Dkt. 90-6] Highlighted portions at ECF page 2 Highlighted portions at ECF pages: For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. GRANTED.	Ahearn in Support of		
Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Highlighted portions at ECF page 2 Highlighted portions at ECF pages: For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. GRANTED.	Preliminary Injunction	3 (employee name)	GRANTED.
Exhibit A to Ahearn Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Highlighted portions at ECF page 2 Highlighted portions at ECF pages: For the reasons explained above, GRANTED. For the reasons explained above, GRANTED. GRANTED.	[Dkt 90.6]		
Declaration [Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Injunction Declaration of explained above, GRANTED. Highlighted portions at ECF pages: For the reasons explained above, GRANTED. GRANTED. GRANTED.	Exhibit A to Ahearn	Highlighted nortions at FCF page 2	For the reasons
[Dkt. 90-7] Third Declaration of Prem Pinto in Support of Preliminary Injunction Injunction [Dkt. 90-7] Highlighted portions at ECF pages: 2:26 (filename) 3:12 (filename) 3:14 (filename)		riigiiigiioa portiono at Lei page 2	
Third Declaration of Prem Pinto in Support of Preliminary Injunction Highlighted portions at ECF pages: 2:26 (filename) 3:12 (filename) 3:14 (filename)			
Prem Pinto in Support of Preliminary Injunction 2:26 (filename) 3:12 (filename) 3:14 (filename)		***	
of Preliminary Injunction 2:26 (filename) 3:12 (filename) 3:14 (filename)		Highlighted portions at ECF pages:	
Injunction 3:12 (filename) 3:14 (filename)		2.26 (filonoma)	
3:14 (filename)			GRANLED.
	Injunenon		
	[Dkt. 90-9]	3:16 (filename)	

Document	Portions to Be Sealed	Court Ruling
Declaration of Sean McDermott in Support of Preliminary Injunction [Dkt. 90-8]	Entire document	This document was STRICKEN and, accordingly, the Court did not consider it and may maintain the document under seal.
Defendants' Proposed Sur-Reply in Opposition to Tesla's Motion for Preliminary Injunction [Dkt. 91-3]	Portions at PDF pages: i:5 (name of Tesla employee) 1:8 (name of Tesla employee) 1:9 (vendor name) 1:21 (Tesla employee name) 1:23 (vendor name) 1:24 (Tesla employee name) 1:25 (Tesla employee name) 1:26 (Tesla employee name) 1:28 (employee name & vendor name) 2:1 (Tesla employee name) 2:1 (vendor name) 2:2 (vendor name) 2:3-4 (sensitive Tesla vendor information) 2:8 (Tesla employee name) 2:9 (vendor name) 2:22-23 (filename) 2:1 (vendor name, vendor's product name, and vendor website) 3:1-2 (filename	For the reasons explained above, GRANTED.
Defendants Objection to New Evidence and Argument in Tesla's Reply ISO Motion for Preliminary Injunction [Dkt. 91-2]	3:3 (Tesla employee name) Portions at PDF pages: 3:23 (vendor name)	For the reasons explained above, GRANTED.

The Clerk of the Court shall maintain Dkts. 17-4, 14-34, 44-4, 65-4, 65-5, 65-6, 65-7–65-13, 65-14, 70-3, 71-2, 71-4–71-10, 71-11–17, 71-18, 71-19, 90-5–90-9, 91-2 and 91-3 under seal. Additionally, **no later than December 1, 2025**, in accordance with the Court's order above, **Tesla shall file** more narrowly redacted, public versions of Dkts. 65-6 (Supp. Decl. of Prem Pinto), 70-3 (Li Decl.), 71-2 (Defendants' Opposition), 71-9 (Ex. F to the Venkatesan Decl.) and 71-18 (Woodland Decl.). The Clerk of Court shall unseal Dkts. 71-16 and 71-17 in their entirety. **SO ORDERED.**

Dated: November 14, 2025

SUSAN VAN KEULEN United States Magistrate Judge